## **REMARKS**

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of March 24, 2006. Claims 1-31 are currently pending.

Reconsideration of the Application is requested.

## **The Office Action**

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The Examiner rejected independent claim 1 under 35 USC 102(e) as being anticipated by Gotoh (US 2002/0024548 A1). The Examiner stated that in the example provided by Gotoh, half of the turned-on pixels are printed in two passes, with only one-quarter of the turned-on pixels being printed in a single pass, and thus three-quarters of the turned-on pixels are restricted from being printed. (The Examiner references Gotoh, paragraph 71).

However, claim 1 claims a method of halftoning for multi-pass rendering including restricting a substantial majority of the pixels turned on to render a tone to the minimum number of passes required to produce the tone. As described in the Summary of the Invention, paragraph 10, the invention concentrates the minority black pixels needed for rendering the highlight regions of the image in a single partition so as to use the minimum number of passes, in this case a single pass, in order to produce the tone. Thus by printing as many pixels as possible to render the tone in the fewest number of passes, the invention ensures that the gap between the minority pixels is not affected by inter-pass mis-registration errors. This is particularly useful for printing in the highlight regions where graininess due to these areas is a big problem.

Gotoh does not disclose this feature of the invention as claimed. Gotoh, as the Examiner has stated, prints half of the turned-on pixels in two passes, with only one-quarter of the turned-on pixels being printed in a single pass. Thus, does not teach restricting a substantial majority of the pixels turned on to render a tone to the minimum number of passes required to produce the tone and, therefore, claim 1 is patentable over Gotoh. Further claims 2-24 depending from claim 1 are also patentable.

The Examiner rejected independent claims 25 and 28 under 35 USC 102(e) as also being anticipated by Gotoh. These claims are also patentable for the reasons stated above, as are claims 26, 27 and 29-31 depending therefrom.

## CONCLUSION

For the reasons detailed above, it is submitted all claims remaining in the application (Claims 1-31) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Patrick D. Floyd, at Telephone Number (216) 861-5582.

Respectfully submitted,

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5/31/06 Date

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